

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

CAROL NELSON, individually and as joint tenant,
and STANLEY NELSON, individually and as joint
tenant,

Defendants.

Adv. Pro No. 10-04377 (SMB)

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

CAROL NELSON,

Defendant.

Adv. Pro No. 10-04658 (SMB)

DEFENDANTS' PROPOSED WITNESS LIST

Defendants, Carol and Stanley Nelson, by and through undersigned counsel, hereby submit the following list of individuals who will or may be called as witnesses in the consolidated trial of the above captioned adversary proceedings.

1. Agatha M. Cole

Agatha M. Cole is an attorney with Chaitman LLP. She is admitted to practice in New York and is a former employee of Dow Jones.

2. Steve Maslow

Steve Maslow is a former Managing Director/Principal at Bear Stearns & Co.

3. Enrica Cotellessa-Pitz, testimony presented by deposition if unavailable to appear.

Enrica Cotellessa-Pitz is a former employee of Bernard L. Madoff Investment Securities and of Bernard L. Madoff Investment Securities LLC. Defendants intend to offer the following excerpts from her deposition in this case:

April 9, 2019

Pg. 52:3 to 53:21

Pg. 55:1 to 57:12

Pg. 57:13 to 58:17

Pg. 58:18 to 59:10

Pg. 59:11 to 60:19

Pg. 60:21 to 61:5

Pg. 64:9 to 65:3

Pg. 65:9-12

Pg. 65:16 to 66:7

Pg. 66:15 to 67:9

Pg. 69:5 to 70:12

Pg. 71:2-22

Pg. 72:23 to 73-2

Pg. 73:3 to 76:1

Pg. 76:18 to 81:4

Pg. 81:5-17

Pg. 82:13 to 83:25

Pg. 88:7 to 90:1

Pg. 90:6-12

Pg. 90:21 to 91-20

Pg. 91:24 to 93:13

Pg. 93:21 to 94:6

Pg. 94:21 to 95:11

Pg. 95:12 to 96:9

Pg. 97:7-17

Pg. 97:18 to 98-1

Pg. 98:2-5

Pg. 100:2 to 101:25

Pg. 102:1 to 103:5

Pg. 103:14-23

Pg. 105:18 to 108:25

Pg. 109:1 to 110:2

Pg. 110:3-25

Pg. 111:1 to 112:9

Pg. 112:10-24

Pg. 112:25 to 113:18

Pg. 114:8-25

Pg. 116:12 to 118:20

Pg. 118:21 to 120:2

Pg. 123:24 to 124:16

Pg. 125:6-20

Pg. 126:3 to 127:15

Pg. 127:16 to 128:22

Pg. 129:5-16

Pg. 129:17 to 130:18

Pg. 130:19 to 131:14

Pg. 131:15 to 133:3

Pg. 133:4-18

Pg. 133:19 to 134:15

Pg. 134:22 to 135:13

Pg. 136:5-21

Pg. 137:25 to 138:5

Pg. 138:21 to 139:13

Pg. 139:25 to 141:18

Pg. 141:19 to 142:11

Pg. 142:12-15

Pg. 143:7-10

Pg. 143:16-19

Pg. 143:20-23

Pg. 148:15 to 149:7

Pg. 150:7 to 151:20

Pg. 151:21 to 153:3

Pg. 154:19-24

Pg. 155:8-22

Pg. 155:23 to 158:4

Pg. 158:5 to 161:6

Pg. 161:13-8

Pg. 162:9 to 164:9

Pg. 164:10 to 165:11

Pg. 165:12 to 166:5

Pg. 166:6 to 167:8

Pg. 167:9-24

Pg. 167:25 to 168:16

Pg. 168:17 to 171:15

4. Bernard L. Madoff, testimony presented by deposition.

Bernard L. Madoff was the sole proprietor of Bernard L. Madoff Investment Securities and was the sole member of Bernard L. Madoff Investment Securities LLC. Defendants intend to offer the following excerpts from his deposition in this case:

December 20, 2016

Pg. 18:9-15

Pg. 18:16-21

Pg. 19:8-17

Pg. 19:18 to 20:4

Pg. 20:5-24

Pg. 26:18 to 27:1

Pg. 34:5-25

Pg. 35:1-5

Pg. 35:9-17

Pg. 38:1-12

Pg. 42:1-15

Pg. 46:3 to 46:9

Pg. 46:18 to 47:2

Pg. 54:21 to 56:13

Pg. 56:14-19

Pg. 57:5 to 58:4

Pg. 58:16-20

Pg. 59:1-14

Pg. 59:20 to 60:15

Pg. 60:16 to 61:6

Pg. 63:12 to 64:10

Pg. 64:11 to 65:19

Pg. 79:8-15

Pg. 79:16 to 80:13

Pg. 80:14 to 81:3

Pg. 81:4-10

Pg. 90:7-11

Pg. 93:22 to 94:5

Pg. 94:17-19

Pg. 95:19 to 96:11

Pg. 96:15 to 97:12

Pg. 98:4-12

Pg. 100:9-13

Pg. 100:17 to 101:15

Pg. 103:19-22

Pg. 104:05 to 108:4

Pg. 109:8 to 112:4

Pg. 114:19 to 115:13

Pg. 115:23 to 117:21

Pg. 118:23 to 120:2

Pg. 120:10-14

Pg. 120:20 to 121:9

Pg. 121:23 to 123:13

Pg. 123:19 to 124:5

Pg. 124:11 to 126:5

Pg. 126:20 to 127:14

Pg. 128:7-12

Pg. 129:10-13

Pg. 129:16 to 131:12

Pg. 132:12-24

Pg. 132:25 to 134:2

Pg. 134:3 to 135:24

Pg. 136:16 to 138:16

Pg. 139:13-18

Pg. 140:19-23

Pg. 143:9 to 145:16

Pg. 146:11-14

Pg. 148:16 to 149:3

Pg. 149:10-19

Pg. 150:2-18

Pg. 161:12-25

Pg. 162:5-21

Pg. 169:12-24

Pg. 175:12 to 176-6

Pg. 176:10-17, 19

Pg. 182:8 to 183:15

Pg. 183:20 to 184:10

Pg. 186:7-18

Pg. 186:22 to 187:17

Pg. 187:23 to 188:7

April 26, 2017

Pg. 11:10 to 12:4

Pg. 12:8-11

Pg. 15:9-19

Pg. 15:25 to 16:2

Pg. 16:3-10

Pg. 19:1-21

Pg. 20:8-12

Pg. 21:18-23

Pg. 22:25 to 24:5

Pg. 24:6 to 25:13

Pg. 25:14 to 26:12

Pg. 27:16-22

Pg. 30:10 to 31:6

Pg. 31:17-25

Pg. 32:4 to 33:5

Pg. 33:9-25

Pg. 34:19 to 36:10

Pg. 38:11-19

Pg. 38:20 to 39:14

Pg. 39:15 to 40:6

Pg. 40:24 to 41:20

Pg. 43:18 to 44:7

Pg. 44:8-22

Pg. 46:9-19

Pg. 46:20 to 47:12

Pg. 50:24 to 51:9

Pg. 55:4 to 56:11

Pg. 58:23 to 60:1

Pg. 77:2-20

Pg. 77:21 to 79:18

Pg. 82:21 to 85:6

Pg. 87:1 to 89:19

Pg. 90:15 to 91:2

Pg. 107:14 to 108:4

April 27, 2017

Pg. 280:18-22

Pg. 281:9-15

Pg. 282:13-15

Pg. 289:6-15

November 8, 2017

Pg. 483:11-19

November 9, 2017

Pg. 517:10-13

5. Irving H. Picard

Irving H. Picard is the Plaintiff in these actions.

6. Richard M. Oppenheim

Richard M. Oppenheim, accountant to Defendants, is a former IRS agent and the Managing Partner at Richard M. Oppenheim Associates, LLP.

Dated: New York, New York
May 1, 2019

CHAITMAN LLP

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and Stanley Nelson*